

2003 SEP 16 P 1:50

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FAA-2003-15653

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Flightdeck Security On Large	)	
Cargo Airplanes Under 14 C.F.R.	)	
Parts 121 and 129	)	FAA-2003-15653
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The Federal Aviation Administration ("FAA") and the Department of Transportation ("DOT" or the "Department") have requested public comments on the Final Rule for Flightdeck Security on Large Cargo Airplanes, 68 F.R. 42874, July 18, 2003, which provides an alternative means of compliance for operators of all-cargo aircraft that are required to have a reinforced security flightdeck door.

Cargolux believes that the implementation of a security program as approved by the TSA would provide the same or better level of security as a retrofit flightdeck door due to the unique nature of cargo operations and

the specific configuration of Cargolux's entire 747-400 freighter fleet.

Cargolux has always maintained a tight security program as mandated by the Joint Aviation Authority ("JAA") in accordance with ICAO recommendations and European Union requirements. Further, this security program has been approved by the United States Customs Service in accordance with the Air Carrier Initiative Program in which Cargolux is an active participant. Since September 11, 2001, Cargolux has enhanced this program. Cargolux uses private security companies at departure points for all United States gateways for access control. All Cargolux crew and ground staff receive security awareness training and regular refresher courses. In addition, Cargolux is in compliance with, and is part of the APIS program and recently has joined the Customs-Trade Partnership Against Terrorism ("C-TPAT").

Cargolux's entire fleet (twelve B747-400F freighter aircraft) was built without cockpit doors, due to structural design criteria (Class E). Installation of reinforced cockpit doors and modification of the aircraft would be neither economical nor safe<sup>1</sup>, and would be very costly and time-consuming. Cargolux estimates, using FAA's estimates as a starting point, that it would cost between \$150,000 to \$200,000 (and maybe more) to retrofit all of its aircraft since the task would require bulkhead modification in addition to installation of a reinforced door. Needless to say it also would require months to accomplish this task. Also, if Cargolux were to choose

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<sup>1</sup> Depending on the location and structure of the bulkhead and door components, installation could affect access to the upper deck emergency exit from the area where passengers are housed, resulting in additional safety problems.

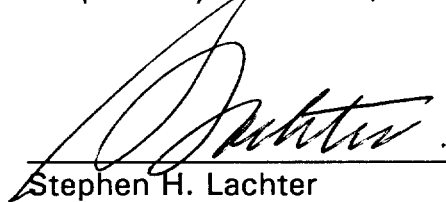
the option of the flight deck door retrofit, the vendor would not be able to meet the requirements for complete installation and certification by the Oct. 1, 2003 deadline.

Additionally, Cargolux already has an excellent security program in place that satisfies the requirements of all U.S. and international regulatory bodies. Obtaining TSA approval for this security program should require far less expenditure than installing reinforced cockpit doors and entail a shorter period of time for compliance.

Most importantly, owing to the unique nature of its all-cargo operations, Cargolux does not carry revenue passengers, only designated persons described in the JAA Approved Airplane Flight Manual. Persons carried on Cargolux aircraft -- cargo agents and attendants and company personnel -- are few in number and individually screened. They are checked against the passenger manifest on boarding the aircraft and their checked baggage and hand baggage is screened. On most occasions, passengers who travel on Cargolux aircraft are personally known by the crew, and those who are not known are questioned and checked by the crew prior to departure. Cargolux has a Luxembourg Government approved security procedure for designated "persons" traveling on the aircraft and individual Cargolux passengers must be approved by a Senior Vice-President prior to authorization to travel on a Cargolux aircraft.

In conclusion, given the unique nature of the cargo industry, the unique nature of Cargolux's fleet, the expense and technical difficulties required to retrofit all Cargolux aircraft and the limited passenger access to Cargolux all-cargo aircraft, Cargolux believes that the security needs of the United States can be best met by allowing cargo carriers to adopt a TSA approved security program rather than installing reinforced flightdeck doors on cargo aircraft. For these and other reasons, Cargolux Airlines International supports the Final Rule on Flightdeck Security on Large Cargo Airplanes in this docket.

Respectfully submitted,



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